

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

*Plaintiff,*

v.

CHATTANOOGA NEWS CHRONICLE,  
THEHUFFINGTONPOST, INC.,  
REPRESENTATIVE STEVE COHEN,  
US DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA, OHIO  
INTELLIGENCE TIPS, ROSS ELDER,  
and ALI ABDUL RAZAQ AKBAR A/K/A  
ALI ALEXANDER,

*Defendants.*

Civil Action No. 1:21-cv-317

**DECLARATION OF NICOLE NOLLETTE IN SUPPORT OF  
DOMINION'S MOTION TO DISMISS**

I, Nicole Nollette, declare as follows:

1. I am an adult resident of the State of Colorado and am otherwise competent to make this declaration.
2. I have personal knowledge of the facts set forth below, and if called upon to do so, I could and would competently testify thereto.
3. I am the Executive Vice President of Operations for Dominion Voting Systems, Inc and have held that position for almost six years. Based on my position, I am knowledgeable about the overall operations of all three of the Dominion entities involved in this lawsuit; US Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation.
4. U.S. Dominion, Inc. is the parent company of both Dominion Voting Systems, Inc.

and Dominion Voting Systems Corporation, both of which are wholly-owned subsidiaries of US. Dominion, Inc. U.S. Dominion, Inc. operates purely as a holding company for its subsidiaries.

5. US Dominion, Inc. and Dominion Voting Systems, Inc. are both Delaware corporations and have their principal places of business in Denver, Colorado.

6. Dominion Voting Systems Corporation is an Ontario, Canada corporation and has its principal place of business in Toronto, Ontario, Canada.

7. Dominion Voting Systems, Inc. contracts with state and local governments across the United States to provide voting systems and related services. In 2020, Dominion Voting Systems, Inc. had contracts in 28 states and Puerto Rico.

8. Dominion Voting Systems Corporation primarily contracts with provincial and local governments across Canada to provide voting systems and services. As an exception, Dominion Voting Systems Corporation has a single contract in the State of New York.

9. US Dominion, Inc. and Dominion Voting Systems Corporation do not have any contacts with Tennessee. Those entities do not carry on any business activities in Tennessee. They do not have any offices and do not own any property in Tennessee. They do not sell any products or services in Tennessee. They do not solicit any business in Tennessee. They do not employ anyone in Tennessee. Those entities do not avail themselves of any of the privileges and benefits of Tennessee law in any way.

10. Dominion Voting System, Inc. does not have any offices and does not own any property in Tennessee.

11. Dominion Voting Systems, Inc. currently employs 127 people. Of the company's 127 employees, Dominion Voting System, Inc. employs only one person who resides in Tennessee. That lone employee works remotely out of her home in Tennessee as a matter of convenience to her and she is not responsible for providing any sales or service support to either Tennessee customer. Her title is Director, Election Production and Testing and she works exclusively for

customers outside of the State of Tennessee.

12. Dominion Voting Systems, Inc. currently has approximately 2,850 contracts to provide voting systems and services. Of those, Dominion Voting System, Inc. only has two contracts with parties in Tennessee, one with Hamilton County, Tennessee, and the second with Williamson County, Tennessee. Those two contracts represent roughly .07% of the company's contracts with third parties to provide voting systems and services. Under those two contracts, Dominion Voting System, Inc. sold voting machines, licensed software, and provides services as requested or as provided for in the contracts, in connection with the counties use of the Dominion system and licensed software related to elections that are held in the counties and that are duly called and administered by county officials. Under the two contracts, Dominion Voting Systems, Inc. does not have regular and continuous communications or dealings with representatives of the two counties in Tennessee. At most, the communications with county officials are sporadic and limited to the period of time before and shortly after a scheduled county election occurs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of January 2022 at Denver, Colorado.

A handwritten signature in black ink, appearing to read "Nicole Nollette", written over a horizontal line.

Nicole Nollette

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2022, a copy of the foregoing was filed via the Court's CM/ECF system which will send notice of this filing via electronic mail notice to the following:

Russell A. Newman The Newman Law Firm 6688 Nolensville Road Suite 108-22 Brentwood, TN 37027 russell@thenewmanlawfirm.com	Todd Tatelman Sarah Clouse United States House of Representatives, General Counsel 219 Cannon House Office Building Washington, DC 20515 202-225-9700 todd.tatelman@mail.house.gov sarah.clouse@mail.house.gov
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And sent via U.S. Mail to the following:

MEDIA MATTERS FOR AMERICA 75 Broadway Street, Suite 202 San Francisco, CA 94111	ALI ABDUL RAZAQ AKBAR A/K/A ALI ALEXANDER 5125 Pinellas Avenue Keller, TX 76244
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/s/ W. Scott Sims  
W. Scott Sims